



FEDERAL LAW ENFORCEMENT  
WIRELESS USERS GROUP  
WASHINGTON, D.C.



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September 12, 2000

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
TW-A325  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: Comments, In the Matter of Revision of Part 15 of the Commission's  
Rules Regarding Ultra-Wideband Transmission Systems, Notice of  
Proposed Rule Making, in ET Docket No. 98-153**


Dear Ms. Salas:

On behalf of the Federal Law Enforcement Wireless Users Group (FLEWUG) and pursuant to Section 1.419 of the Commission's rules, 47 C.F.R. § 1.419 (1999), enclosed herewith for filing are an original and four (4) copies of the FLEWUG's Comments in the above-referenced proceeding.

Kindly date-stamp the additional, marked copy of this cover letter and return it in the envelope provided.

Should you require any additional information, please contact the undersigned.

Respectfully submitted,

  
James J. Flyzik  
Deputy Assistant Secretary  
(Information Systems), and  
Chief Information Officer,  
Department of the Treasury, and  
Vice Chair, Government Information Technology  
Services Board

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List A B C D E

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of	)	
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	)	
Revision of Part 15 of the Commission's Rules	)	ET Docket No. 98-153
Regarding Ultra-Wideband Transmission	)	
Systems	)	
	)	

**COMMENTS TO NOTICE OF PROPOSED RULEMAKING**

Filed by: The Federal Law Enforcement Wireless Users Group

Date: September 12, 2000

Before the  
Federal Communications Commission  
Washington, DC 20554

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In the Matter of

Revision of Part 15 of the Commission's Rules  
Regarding Ultra-Wideband Transmission  
Systems

ET Docket No. 98-153

**FEDERAL LAW ENFORCEMENT WIRELESS USERS GROUP'S**  
**COMMENTS IN RESPONSE TO NOTICE OF PROPOSED RULEMAKING**

1. The Federal Law Enforcement Wireless Users Group (FLEWUG)<sup>1</sup> respectfully submits the following Comments to the Commission's Notice of Proposed Rulemaking, *In the Matter of Revision of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission Systems*. In the Ultra-Wideband (UWB) Notice of Proposed Rulemaking (NPRM), the Commission requests information from the wireless community on UWB technology to help guide possible policy and regulation in such matters.

**I. BACKGROUND**

2. Given its mission, the FLEWUG has a clear interest in the proceedings related to the development of any new technology that could potentially enhance or otherwise affect the

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<sup>1</sup> The FLEWUG is composed of law enforcement and public safety officials from the Department of the Treasury, Department of Justice, Department of the Interior, Department of Agriculture, Department of Defense, Department of Health and Human Services, United States Postal Service, United States Postal Inspection Service, National Telecommunications and Information Administration, Federal Emergency Management Agency, Internal Revenue Service, Federal Bureau of Investigation, United States Secret Service, United States Coast Guard, United States Capitol Police, Drug Enforcement Administration, United States Park Police, Immigration and Naturalization Service, United States Customs Service, Bureau of Alcohol, Tobacco, and Firearms, United States Mint, National Communications System, Defense Information Systems Agency, National Security Agency, Federal Law Enforcement Training Center, Bureau of Engraving and Printing, United States Marshals Service, National Institute of Standards and Technology, United States Forest Service, United States Fish and Wildlife Service, Federal Bureau of Prisons, Bureau of Land Management and National Park Service.

operation of public safety wireless communications. The FLEWUG is particularly interested in the potential of new and emerging technologies to substantially enhance the roles of its constituency, and of public safety providers at all levels of government.<sup>2</sup> Accordingly, the FLEWUG is pleased to offer the following comments to the NPRM.

## **II. DISCUSSION**

3. The FLEWUG is encouraged that UWB technology may represent a potential enhancement to public safety wireless communications and the efficient use of spectrum, and for this reason, encourages and supports the extensive studying of UWB technology. The National Telecommunications and Information Administration (NTIA) is currently undertaking a detailed technical analysis of UWB devices and the related technology. This in-depth study of the technology is expected to significantly inform the Commission and other interested parties of the operational and technical parameters of UWB operations. Due to the complexity of the evaluation, a significant amount of time will be required to complete the NTIA study. The results of the study will therefore be released after the September 12, 2000, deadline to file comments to the NPRM.

4. The FLEWUG urges the Commission to not undertake a final rulemaking until NTIA and other technical evaluators are able to make precise evaluations of this technology. The FLEWUG restates its optimism concerning this new technology, however is concerned that public safety agencies at all levels of government may significantly invest in this new technology before its precise operating parameters are known. The FLEWUG is particularly concerned that a thorough study of UWB interference effects is necessary in order to disclose any potential problems to safety-of-life operations.

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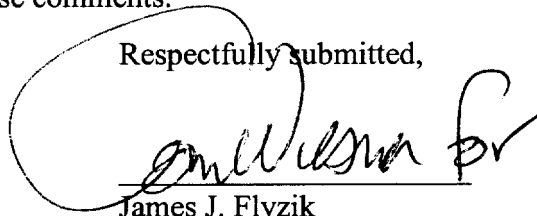
<sup>2</sup> See, generally FLEWUG Reply Comments, *In the Matter of Inquiry Regarding Software Defined Radios*, ET Docket No. 00-47, July 17, 2000.

### III. CONCLUSION

5. It is imperative the Commission allows for thorough testing and evaluation of this technology before any rulings are made. The FLEWUG reasserts its concern about the protection of all public safety radio receivers from interference to any extent or for any duration in order to ensure the protection of lives and property.

6. The FLEWUG commends the efforts of those parties whose input was considered in the drafting of the NPRM. The FLEWUG respectfully requests the Commission to carefully consider the positions in these comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James J. Flyzik", is written over a horizontal line. The signature is stylized and cursive.

James J. Flyzik  
Deputy Assistant Secretary  
(Information Systems), and  
Chief Information Officer,  
Department of the Treasury, and  
Vice Chair, Government Information Technology  
Services Board

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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Revision of Part 15 of the Commission's Rules  
Regarding Ultra-Wideband Transmission  
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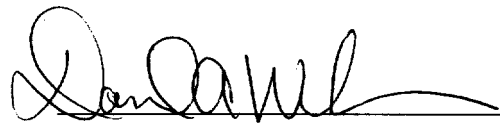
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ET Docket No. 98-153

**CERTIFICATE OF SERVICE**

I, David A. Williams, Senior Associate, Booz-Allen & Hamilton, Inc., 8283 Greensboro Drive, McLean, Virginia, 22102-3838, hereby certify that on this date I caused to be served, by first-class mail, postage prepaid (or by hand where noted) copies of the Federal Law Enforcement Wireless Users Group's Comments regarding the Commission's Notice of Proposed Rulemaking, in the above-styled proceeding, the original of which is filed herewith and upon the parties identified on the attached service list.

DATED at Fair Oaks, Virginia this 12<sup>th</sup> day of September 2000.

  
David A. Williams

## SERVICE LIST

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